1 LOKER LAW, APC Matthew M. Loker, Esq. (279939) 2 matt@loker.law 3 1303 East Grand Avenue, Suite 101 Arroyo Grande, CA 93420 4 Telephone: (805) 994-0177 5 Facsimile: (805) 994-0197 6 Attorney for Plaintiff, 7 **Christopher Petras** 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 CHRISTOPHER PETRAS, Case No.: 20-cv-874-RFB-BNW 11 Plaintiff, **JOINT MOTION TO DISMISS** 12 v. 1303 EAST GRAND AVENUE, SUITE 101 **DEFENDANT EXPERIAN** 13 INFORMATION SOLUTIONS, INC. RROYO GRANDE, CA 93420 WITH PREJUDICE PURSUANT TO 14 NAVY FEDERAL CREDIT FED. R. CIV. P. 41(A) **UNION; JPMORGAN CHASE** 15 BANK, NATIONAL HON. RICHARD F. BOULWARE, II 16 **ASSOCIATION**; EQUIFAX **INFORMATION SERVICES** 17 LLC; AND, EXPERIAN INFORMATION SOLUTIONS, 18 INC. 19 Defendant. 20 21 22 23 24 25 26 27 28 CASE No.: 20-cv-874-RFB-BNW Petras v. Navy Federal Credit Union, et al. TION TO DISMISS DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC. WITH

PREJUDICE PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(A)

Plaintiff CHRISTOPHER PETRAS ("Plaintiff") and Defendant EXPERIAN INFORMATION SOLUTIONS, INC. ("Experian"), by and through their undersigned counsel, respectfully submit this Joint Motion for Dismissal pursuant to Rule 41(a) of the Federal Rule of Civil Procedure.

Plaintiff and Experian hereby jointly move to dismiss Experian WITH PREJUDICE with each party to bear its own costs and attorneys' fees.

To dispel ambiguity, Plaintiff's claims against the following remain active: Defendant JPMORGAN CHASE BANK, NATIONAL ASSOCIATION ("Chase").

Date: July 21, 2021 LOKER LAW, APC

By: /s/ Matthew M. Loker

MATTHEW M. LOKER, ESQ.

ATTORNEY FOR PLAINTIFF

JONES DAY

By: <u>/s/ Jordan B. Arakawa</u>
JORDAN B. ARAKAWA, ESQ.
ATTORNEY FOR DEFENDANT, EXPERIAN

## **SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Defendant's respective legal counsels and that I have obtained their authorizations to affix their electronic signatures to this document.

Date: July 21, 2021 LOKER LAW, APC

By: /s/ Matthew M. Loker

MATTHEW M. LOKER, ESQ.

ATTORNEY FOR PLAINTIFF

CASE No.: 20-cv-874-RFB-BNW 1 OF 2 Petras v. Navy Federal Credit Union, et al.

## **CERTIFICATE OF SERVICE**

A copy of the foregoing *Joint Motion to Dismiss Experian with Prejudice Pursuant to Fed. R. Civ. P. 41(a)* has been submitted on July 21, 2021through the Court's electronic filing system. All parties may access the foregoing via the Court's electronic filing system.

/s/ Matthew M. Loker MATTHEW M LOKER, ESQ.

CASE NO.: 20-cv-874-RFB-BNW

2 OF 2

Petras v. Navy Federal Credit Union, et al.

1 2 3 UNITED STATES DISTRICT COURT 4 DISTRICT OF NEVADA 5 CHRISTOPHER PETRAS, Case No.: 20-cv-874-RFB-BNW 6 7 Plaintiff, [PROPOSED] ORDER RE: DISMISSAL OF DEFENDANT 8 v. **EXPERIAN INFORMATION** 9 SOLUTIONS, INC. NAVY FEDERAL CREDIT 10 **UNION; JPMORGAN CHASE** HON. RICHARD F. BOULWARE, II **BANK, NATIONAL** 11 **ASSOCIATION; EQUIFAX** 12 **INFORMATION SERVICES** LLC; AND, EXPERIAN 13 INFORMATION SOLUTIONS, 14 INC. 15 16 Defendant(s). 17 18 Based upon the Parties' Stipulation, and good cause, this Court hereby 19 orders EXPERIAN INFORMATION SOLUTIONS, INC. to be, and is, dismissed 20 with prejudice. 21 22 23 IT IS SO ORDERED. 24 25 Dated: January 26, 2022. 26 HON. RICHARD F. BOULWARE, II 27 UNITED STATES DISTRICT COURT JUDGE 28 CASE No.: 20-cv-874-RFB-BNW Petras v. Navy Federal Credit Union, et al. [PROPOSED] ORDER RE: DISMISSAL OF DEFENDANT EXPERIAN INFORMATION SOLUTIONS,

INC.